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April 10, 2024

**VIA CM ECF**

Hon. Sarah Netburn  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Goldner v. Norris et al.***

Dear Judge Netburn,

Plaintiffs, Marc Goldner, Individually and as Officer of Golden Bell Entertainment, LLC, a California company, and Golden Bell Studios, LLC, Golden Bell Entertainment, LLC, a Nevada company, and Golden Bell Studios, LLC, write this letter motion seeking a brief, 30 day extension of the currently pending deadlines of April 15, 2024 to file a stipulation to dismiss the claims against the Andrews McMeel defendants, and the April 30, 2024 deadline to file a motion for leave to amend the Complaint, if any.

President and Chief Creative Officer of Golden Bell, Rachel Korsen's, mother was diagnosed with cancer last week, and she has been taken from her business duties to attend to her mother out of state and assist with doctor appointments. Both Rachel and Marc Goldner have been unable to review and assess their counsel's analysis and recommendations regarding their claims as a result of the cancer diagnosis and related obligations, and have requested a short continuance of the current deadlines to provide them with time to consider their claims and how Plaintiffs will proceed in this matter.

My office has conferred with counsel for the Andrews McMeel defendants, and counsel for Mr. Norris, and both have consented to the extension of time. Given the extenuating circumstances, and the intention to provide Plaintiffs with adequate time to evaluate their claims, we respectfully request that this Court grant a 30-day extension of time to May 15, 2024, to file a stipulation to dismiss the claims against the Andrews McMeel defendants, and to May 30, 2024, to file a motion for leave to amend, if any. There have been no prior requests for extensions of time.

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RESPECTFULLY SUBMITTED,

GERARD FOX LAW P.C.

By: 

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